REMARKS

Claims 1 and 3-11 are pending upon entry of this amendment. Claims 1, 8 and 11 have been amended and claim 2 has been cancelled. The amendment is supported by the specification on, e.g., para. [0011]. No new matter is presented.

Claims 1-4 are rejected under 35 USC 102(b) as being anticipated by Wootton, U.S. Patent No. 6,128,298. This rejection is respectfully traversed.

Amended claim 1 recites "a second device located outside the public network, the second device not including a listening socket; wherein … the IP device cannot initiate a connection with the second device due to the second device not having a listening socket." This feature is not taught or suggested by Wootton. There is no teaching or suggestion in Wootton that private node 18, which the Examiner compares with the claimed "second device," does not include a listening socket. In fact, each of the nodes 18 is able to communicate with other nodes 18 within the private network 10 and therefore includes a listening socket to enable such communication. Wootton, col. 5, lines 16-20. Moreover, the inability of the Internet nodes 20 in Wootton to initiate a communication request is not due to the private node 18 not having a listening socket as required by claim 1; rather, in Wootton's system, the Internet node 20 cannot initiate such communication request because the IP filter 12 does not accept such communication request from the Internet node 20. Wootton, col. 5, lines 30-36.

Accordingly, Wootton fails to anticipate claim 1. Claims 2-4 depend from claim 1 and are similarly allowable.

Claims 5-9 are rejected under 35 USC 103(a) as being unpatentable over Wootton in view of Andersson, U.S. Patent No. 6,931,016. This rejection is respectfully traversed.

Claims 5-7 depend from claim 1. Andersson fails to overcome the deficiency of Wootton in teaching the features of claim 1 discussed above. Thus, claims 5-7 are allowable.

Claim 8, as amended, recites "a second device located on a private network having a responder function with a private IP address and port number, the second device not including a listening socket." As discussed above, this feature is not taught or suggested by Wootton. Andersson fails to overcome this deficiency and is relied upon by the Examiner merely for its alleged teaching of a third device having a memory and storing information for publication or private source date. Accordingly, claim 8 is allowable.

Claims 9-11 are rejected under 35 USC 103(a) as being unpatentable over Wootton in view of Foulkes, WO 02/30082. This rejection is respectfully traversed.

Claim 9 recites "the listening application receiving a request from a remote application and sending incoming requests only to the registered responder application." This feature is not taught or suggested by the combination of Wootton and Foulkes.

The Examiner admits that Wootton does not disclose this feature, but instead relies on Foulkes as allegedly teaching this feature. Applicant respectfully disagrees. The Examiner compares the claimed "listening application", "remote application", and "registered responder application" with Foulkes' disclosure of an IP security server 40, a secure server 50, and an IP client 30, respectively. However, contrary to the claimed invention, the IP security server 40 of Foulkes does not *receive a request* from the secure server 50, but instead sends a request to the secure server 50 and *receives* a validation *response* from the secure server 50 in return. See Foulkes, page 8, last paragraph. Thus, Foulkes does not teach or suggest the claimed "listening application receiving a request from a remote application." Moreover, when the IP security server 40 of Foulkes receives the validation response from the secure server 50, it does not send the validation response only to the IP client 30, but instead can send the validation response to the target server 70. See Foulkes, page 8, last paragraph. Thus, Foulkes does not teach or suggest the claimed "listening application … sending incoming requests only to the registered responder application."

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In addition, the combination of Wootton and Foulkes also fails to teach or suggest the claimed "processing the incoming requests by the responder application; and returning results to the remote application via the listening application," as recited in claim 9. The Examiner once again relies on Foulkes as allegedly teaching this feature. However, the IP client 30 of Foulkes (which the Examiner compares with the claimed "registered responder application") does not return results obtained by processing the incoming requests to the secure server 50 (which the Examiner compares with the claimed "remote application"). In fact, after the secure server 50 sends the validation response, it is no longer involved in any part of the of Foulkes' process. Therefore, Foulkes fails to overcome the deficiency of Wootton in teaching this feature.

Claim 9 is accordingly allowable. Claim 10 recites similar features as claim 9 and is similarly allowable. Claim 11, as amended, is allowable for the reasons provided above with reference to claim 1.

In view of the above, this application is in condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **496332000300**.

Dated: May 12, 2009   Respectfully submitted,

By_____

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